

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

IN RE AIR CARGO SHIPPING  
SERVICES ANTITRUST LITIGATION

MDL No. 1775

Case No. 06-MD-1775 (JG) (VVP)

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND THE DEADLINE  
FOR PLAINTIFFS TO TAKE THE RULE  
30(B)(6) DEPOSITION OF EVA AIRWAYS  
CORPORATION**

WHEREAS Plaintiffs served a Rule 30(b)(6) deposition on EVA Airways Corporation (“EVA”) on November 26, 2013 and noticed a deposition date of December 27, 2013.

WHEREAS counsel for EVA indicated to counsel for Plaintiffs on December 12, 2013 that the unilaterally noticed deadline of December 27, 2013 is not workable for EVA.

WHEREAS counsel for EVA and counsel for Plaintiffs have met and conferred and agreed that subject to the Court’s approval, the Parties will continue to meet and confer and will endeavor to reach an agreement without the need for a deposition.

WHEREAS the parties have agreed that in the event a deposition remains necessary, EVA reserves all of its rights to object to the deposition including, without limitation, any aspect of the notice or the breadth of the topics.

WHEREAS the parties have agreed that in the event a deposition remains necessary, that the deposition will occur on or before May 31, 2014.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the undersigned, that:

The deadline for Plaintiffs to take the Rule 30(b)(6) deposition of EVA (as noticed on November 26, 2013) is extended until May 31, 2014, but that the discovery deadline of December 31, 2013 as between these parties otherwise remains intact.

Dated: December 23, 2013

Respectfully submitted,

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*Counsel for Plaintiffs*

IT IS SO ORDERED:

Date: \_\_\_\_\_

\_\_\_\_\_  
Viktor V. Pohorelsky  
United States Magistrate Judge